

AARON D. FORD  
Attorney General  
ALEXANDER J. SMITH (Bar No. 15484)  
Deputy Attorney General  
State of Nevada  
Office of the Attorney General  
555 East Washington Avenue  
Suite 3900  
Las Vegas, Nevada 89101  
(702) 486-4070 (phone)  
(702) 486-3773 (fax)  
Email: ajsmith@ag.nv.gov

*Attorneys for Defendants  
Monique Hubbard-Pickett,  
Julie Matousek, Brian Williams,  
Jeremy Bean, Julio Calderin,  
Harold Wickham, Bob Faulkner,  
Michael Minev, Martin Naughton,  
Louisa Sanders, Albert Castellan,  
Jaymie Cabrera, Nonilon Peret,  
and Craig Rose*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

JUSTIN PAULO,

Plaintiff,

v.

BRIAN WILLIAMS, *et al.*,

Defendants.

Case No. 2:19-cv-00474-APG-NJK

**DEFENDANTS' MOTION FOR A  
TWO-DAY EXTENSION OF TIME TO  
RESPOND TO A NOVEMBER 8, 2021  
ORDER (ECF NO. 55) EXPLAINING  
WHY THE COURT SHOULD NOT  
ORDER DEFENDANTS WILLIAMS,  
BEAN, AND WICKHAM TO PAY  
PLAINTIFF'S REASONABLE COSTS  
IN FILING HIS OCTOBER 20, 2021  
(ECF NO. 52) MOTION TO COMPEL  
DISCOVERY**

**(Second Request)**

Defendants, Monique Hubbard-Pickett, Julie Matousek, Brian Williams, Jeremy  
Bean, Julio Calderin, Harold Wickham, Bob Faulkner, Michael Minev, Martin Naughton,  
Louisa Sanders, Albert Castellan, Jaymie Cabrera, Nonilon Peret, and Craig Rose, by and  
through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Alexander

J. Smith, Deputy Attorney General of the State of Nevada, Office of the Attorney General hereby move under Rule 6, Federal Rules of Civil Procedure; Local Rule (LR) IA 6-1; and LR 26-3 for an extension of time of two days from December 13, 2021, to December 15, 2021, to explain why the court should not order Defendants Williams, Bean, and Wickham to pay Plaintiff Justin Paulo's reasonable costs in moving (ECF No. 52) to compel the production of documents, namely tier and yard schedules.

The facts as to why counsel for the defense has recently had to move for several extensions to respond to an order (ECF No. 55) and to a motion (ECF No. 61) in this action are clearly set out in ECF Nos. 59 and 62, namely that the above has recently suffered from several debilitating medical symptoms as well as going through a COVID scare. The PCR test came back negative, but defense counsel has continued recovering from what appears to be the flu; although he continued working throughout that period, his performance was slowed and he is now playing catch-up with various dispositive motions—for example, on Monday of next week two dispositive motions are due in addition to a response to a pending motion for partial summary judgment—in addition to required responses to smaller items such as this.

Defense counsel is responsible for approximately fifty cases, so handling them has proved more challenging whilst laboring under the symptoms of a bad respiratory infection; however, defense counsel is on the mend and working assiduously to catch-up. For obvious reasons outlined in this motion and in ECF Nos. 59 and 62, Defendants demonstrate good cause and respectfully request an additional two days to finalize their response to ECF No. 55, thus taking the due date from December 13, 2021, to December 15, 2021.

DATED this 13th Day of December, 2021.

AARON D. FORD  
Attorney General

IT IS SO ORDERED.

Dated: December 14, 2021

By: /s/ Alexander J. Smith  
ALEXANDER J. SMITH (Bar No. 15484)  
Deputy Attorney General

*Attorneys for Defendants*

  
United States Magistrate Judge